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Ms. Debbie Irwin  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor [95814]  
P.O. Box 100  
Sacramento, California 95812-0100

Re: Comments on the Reissuance of the National Pollutant Discharge  
Elimination System General Permit for Discharges of Storm Water  
Associated with Industrial Activity (Industrial General Permit)

Dear Ms. Irvin:

This firm represents the California National Juice Products Monitoring Group ("NJPA"). NJPA respectfully submits these comments on the proposed reissuance of the Industrial General Permit as issued in draft form on December 19, 2004 ("2004 Proposed Permit"). NJPA is a State Water Resources Control Board ("SWRCB") approved monitoring group in good standing. NJPA has been operating under the provisions of the Industrial General Permit since 1992. Our comments are submitted with the desire of our members to meet their compliance obligations in a manner that will result in protection of the state's waters without placing unrealistic and arbitrary burdens of compliance on industrial dischargers. Group members have been proactive in their efforts to improve the management of storm water discharges since the original Industrial General Permit took effect in 1992 and are willing to engage in process of continuous improvement to effect further improvement.

The current proposed permit, however, contains several elements with which our members have expressed deep concern:

- The imposition of storm water effluent concentration limits either expressly so or in the form of target benchmark concentration limits that are employed by the permit in a manner that makes them "defacto" permit concentration limits;
- Some of the minimum best management practices (BMPs) in the current proposal create redundant compliance activities and documentation that are unnecessary;